



NW_Sage_Grouse, BLM_CO <blm_co_nw_sage_grouse@blm.gov>

Sage Grouse Draft LUP-EIS Comment North Park Stockgrowers

1 message

Philip Anderson <andersonloomix@gmail.com>

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To: blm_co_nw_sage_grouse@blm.gov

Cc: Philip Anderson <andersonloomix@gmail.com>

December 2, 2013

North Park Stockgrowers Association

P.O. Box 735

Walden, CO 80480

Bureau of Land Management

Northwest Colorado District

2815 H Road

Grand Junction, CO 81506

blm_co_nw_sage_grouse@blm.gov

www.blm.gov/wo/st/en/prog/more/sagegrouse.html.

Dear NEPA Coordinator,

The North Park Stockgrowers Association is writing to express our overwhelming concerns with the development of the Bureau of Land Management's Draft Resource Management Plan and Draft Environmental Impact Statement (BLM/DRMP/DEIS). Included are our concerns over the National Technical Team (NTT Report) and the Greater Sage-Grouse Conservation Objective Team Final Report (COT Report) being used as the guiding principles for the development of the BLM/DRMP/DEIS. We therefore, make the following comments to be used in the future development of any documents used to address the United States Fish and Wildlife Service (USFWS) in their efforts toward making a decision about the Greater Sage -Grouse (GSG) and the Endangered Species Act (ESA).

1. The document does not have an alternative that would protect GSG and GSG habitat and at the same time meet multiple-use concepts required under the Multiple-use Sustained Yield Act of 1960, the Federal Lands Policy and Management Act of 1976 and the Forest and Rangeland Renewable Resource Planning Act of 1974 as amended by the National Forest Management Act of 1976. Under the proposed alternatives B,C,and D, it is not defined how the BLM or Forest Service (FS) would implement restrictions and still meet the multiple-use mandates. To help solve this problem and move forward, we suggest that the BLM and FS work in parallel with local private land owners and local Sage Grouse Working Groups, in the development of current GSG conservation projects and plans. Using the NTT and COT reports only for suggested project development in the future development of conservation plans.

2. The proposed restrictions upon GSG and GSG habitat within a four mile buffer around leks are simply not manageable by any agency. Given the fact that these buffer zones have too many differences in habitat quality, and in many cases, acreage inside of these four-mile buffers are visually and scientifically not GSG habitat. Therefore supporting our belief that the BLM and FS are restricting multiple-use management on lands that do not actually have active leks or GSG habitat.

3. After reviewing the NTT and COT reports there is no ground proven scientific evidence to support rigid enforcement of disturbance caps across thousands of acres, when actual benefits to the GSG or its habitat can not be guaranteed. That is why the document needs to make verifiable statements toward continued efforts in preserving current conservation activities and plans.

4. The BLM and FS in drafting this document have underestimated and ignored the negative socioeconomic impact that such restrictions would have

on the regions agricultural production, ranching and farming communities. In addition socioeconomic benefits derived from other multiple-use activities such as coal and hard rock mining, oil and gas drilling, power generation and recreational activities. All are the foundation of present and future communities where jobs and local economies are the foundation of the future of these lands.

We sincerely hope that you will respond favorably to these requests and look forward to working with you to keep the GSG from being listed by the US fish and Wildlife Service as a Endangered Specie.

Sincerely,

Philip Anderson

President North Park Sockgrowers Association